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March 27, 2025

VIA ECF

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State St.
Trenton, NJ 08608

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080 | Custodian Update**

Dear Judge Singh:

I write on behalf of Plaintiffs and Defendants Express Scripts, Inc., Medco Health Solutions, Inc., and Express Scripts Administrators, LLC (collectively, "Express Scripts") pursuant to the Court's directive at the March 11, 2025 discovery conference to update the Court five days after the parties met and conferred. The parties held such a conference regarding custodian proposals on March 20, 2025. Plaintiffs provided a written follow-up to that conferral on March 21, 2025. The parties continue discuss the matters addressed during the meet-and-confer and in their subsequent correspondence and propose to update the Court no later than April 4, 2025, either by joint submission or simultaneous position statements. If that approach is acceptable, we respectfully request that you indicate the Court's approval by so ordering this letter.

We thank the Court for its continuing attention to this matter.

Respectfully submitted,

s/ David R. Buchanan
David R. Buchanan

cc: Honorable Brian R. Martinotti, U.S.D.J.
All Counsel of Record

SO ORDERED:

March 28, 2025


Hon. Rukhsanah L. Singh, U.S.M.J.